REMARKS

Claims 1-37 are pending in the present application, of which Claims 1, 19 and 37 are the independent claims. Claims 1, 2, 4, 6-8, 11-20, 22, 26, 29, 30 and 32-37 are being amended. The amendments are supported by the application, including the claims, as originally filed, and including without limitation ¶¶ 24-34, 35-46 and 47-53, and Figures 1, 2B, 3 and 4. Reconsideration and reexamination are respectfully requested.

Claims 1, 2, 13-15, 19, 20, 31-33 and 37 are rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Patent No. 6,236,978 (Tuzhilin).

By way of some background and without limitation, in accordance with at least one embodiment, user events are generated from multiple application domains such as and without limitation shopping, news, movies, and other domains. A database 114 stores events, e.g., reading an article about skateboarding, rating a skateboarding movie, writing a review of the skateboarding movie, purchasing a skateboarding article, etc. By way of some further non-limiting background, each event stored in the database has associated information to identify the user, item, event type, and the application domain that generated the event. An item in the database, which may be identified as a recommendation, has an associated application domain, e.g., a skateboarding movie is identified in a user event generated by a movies application domain. Information associated with a triggering event for recommendations indicates which of the application domains, e.g., shopping, news, movies, to select recommendations. The information associated with the triggering event indicates which of the plurality of different application domains to select recommendations, e.g., indicating that recommendations are to be selected from certain of the application domains, which can be less than all of the application domains, or all of the application domains.

Claim 1 recites, *inter alia*, collecting user events of a first and a second user across a plurality of different application domains, wherein each of the user events is at least in part defined by one or more user event parameters, the one or more user event parameters comprising an application domain parameter identifying one or the different application domains generating the user event, receiving a triggering event for recommendations, each of the recommendations

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being associated with at least one of the different application domains of the plurality and the triggering event having associated information indicating one or more of the different application domains of the plurality, analyzing the user events to formulate at least one correlation between at least two user events in the database, wherein the at least two user events are from at least two of the different application domains of the plurality, and generating recommendations in response to the triggering event in accordance with application domain of each respective recommendation, the information associated with the triggering event and the at least one correlation between the at least two user events in the database. The Applicant submits that Tuzhilin at least fails to disclose at least these elements of amended claim 1.

Tuzhilin focuses on compressing similar rules into a smaller number of aggregated rules that can be used with a personal shopping assistant and a personal intelligent digital assistant; an aggregated rule is generated by compressing an individual user's rules into one or more aggregated rules, which are then reviewed for selection by a human expert, and only the individual rules that correspond to the aggregated rules selected by the human expert are retained for the individual user. (See Tuzhilin, abstract and col. 2, lines 23-40.) While Tuzhilin may describe collecting data from different domains, such as "credit card transactions, airline reservations and Web site visit transactions," Tuzhilin fails to disclose collecting user events, where each user event is defined by one or more user event parameters, including an application domain parameter identifying the application domains generating the user event. Tuzhilin further fails to disclose receiving a triggering event for recommendations, each of the recommendations being associated with at least one of the different application domains of the plurality and the triggering event having associated information indicating one or more of the different application domains of the plurality, and further fails to disclose generating the recommendations in accordance with the application domain of each respective recommendation, the information associated with the triggering event and the at least one correlation between the at least two user events in the database. In contrast to the claimed subject matter, Tuzhilin describes compressing only individual rules that are "similar" into aggregated rules and using rules retained for the user to generate recommendations.

In further contrast to the recited features of claim 1, Tuzhilin describes aggregating

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similar rules from the same domain to form aggregate rules. Specifically, Tuzhilin states "system[s] and method[s] according to the present invention facilitate[] compressing individual rules into 'aggregated' rules." (Tuzhilin, column 4, lines 59-61.) "[S]everal of the individual rules that are similar (generally pertaining to different users) can be compressed into one aggregated rule pertaining to the same subject matter that can be applicable to several users." *(Id.,* column 5, lines 32-36.) (Emphasis added.) Tuzhilin discloses that "similar rules should have the same number of terms, the same fields C_{ij} ... ," where "C_1, C_2, ... C_n identify a particular transaction (e.g., date of transaction, time of transaction, amount spent, location of the transaction, etc.). (Tuzhilin, column 6, lines 1-2 and column 4, lines 7-9.) Thus, in contrast to "formulat[ing] at least one correlation between at least two user events in the database, wherein the at least two user events are from at least two different domains," as required by claim 1, Tuzhilin describes compressing rules relating to the same transaction type into aggregated rules.

For example, Tuzhilin describes compressing rules stating that if someone is shopping in the evening on a weekday and purchases diapers, then the person also purchases beer. *(Id.,* column 5, lines 36-45.) Tuzhilin discloses that if "it is known that most of the users corresponding to this rule are males, then these rules can be compressed into the aggregated rule" that states if the user is a male and shopping in the evening on a weekday and buys diapers, then the user purchases beer. *(Id.,* column 5, lines 40-45.) Thus, Tuzhilin discloses aggregating rules from the same domain (e.g., shopping domain), but fails to disclose formulating correlations between user events from different domains, as required by claim 1.

As such, Applicants submit that Tuzhilin fails to disclose collecting user events of a first and a second user across a plurality of different application domains, wherein each of the user events is at least in part defined by one or more user event parameters, the one or more user event parameters comprising an application domain parameter identifying one or the different application domains generating the user event, receiving a triggering event for recommendations, each of the recommendations being associated with at least one of the different application domains of the plurality and the triggering event having associated information indicating one or more of the different application domains of the plurality, analyzing the user events to formulate at least one correlation between at least two user events in the database, wherein the at least two

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user events are from at least two of the different application domains of the plurality, and generating recommendations in response to the triggering event in accordance with application domain of each respective recommendation, the information associated with the triggering event and the at least one correlation between the at least two user events in the database, as required by claim 1. Emphasis added.)

Applicants have amended claims 19 and 37 to include features similar to claim 1, and are allowable over Tuzhilin for at least similar reasons. Accordingly, Applicants request the rejections for claims 1, 19 and 37 (and all claims depending there from) be withdrawn and the claims allowed.

Claims 3-12, 16-18, 21-30 and 34-36 are rejected under U.S.C. § 103(a) over Tuzhilin in view of U.S. PGPub. No. 2002/0010625 (Smith). Claims 3-12, 16-18, 21-30 and 34-36 depend from claims 1, 19 and 37, which are allowable over Tuzhilin for at least the reasons stated above. Smith fails to cure the identified deficiencies of Tuzhilin, nor is it alleged to. As such, claims 3-12, 16-18, 21-30 and 34-36 are allowable for at least depending on an allowable independent claim. Accordingly, Applicant requests the rejections be withdrawn and the claims allowed.

In view of the foregoing, the entire application is believed to be in condition for allowance, and such action is respectfully requested at the Examiner's earliest convenience.

Should matters remain which the Examiner believes could be resolved in a telephone interview, the Examiner is requested to telephone the Applicant's undersigned attorney. Alternatively, since it is believed that the claims of the present application are in condition for allowance, the Examiner is respectfully requested to issue a Notice of Allowance at the Examiner's earliest convenience.

The Applicant's attorney may be reached by telephone at 212-801-6729. All correspondence should continue to be directed to the address given below, which is the address associated with Customer Number 76058.

The Commissioner is hereby authorized to charge any required fee in connection with the submission of this paper, any additional fees which may be required, now or in the future, or credit any overpayment to Account No. 50-1561. Please ensure that the Attorney Docket Number is referenced when charging any payments or credits for this case.

Respectfully submitted,

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